



California Regional Water Quality Control Board Los Angeles Region



Linda S. Adams
Acting Secretary for
Environmental Protection

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Edmund G. Brown Jr.
Governor

April 8, 2011

Mr. James Stull
Continental Heat Treating
10643 Norwalk Boulevard
Santa Fe Springs, CA 90670

SUBJECT: APPROVAL OF MODIFICATIONS TO PROPOSED SOIL VAPOR EXTRACTION WELL CONSTRUCTION AND REQUIREMENT FOR INSTALLATION OF DEEP VAPOR MONITORING PROBES IN SOURCE AREA PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER

SITE/CASE: CONTINENTAL HEAT TREATING, 10643 SOUTH NORWALK BOULEVARD, SANTA FE SPRINGS, CA (SCP NO. 1057, SITE ID NO. 204GW00)

Dear Mr. Stull:

Regional Water Quality Control Board, Los Angeles Region (Regional Board) staff has received and reviewed your letter dated March 17, 2011 (Letter), responding to Regional Board staff comments included in our letter to you dated January 14, 2011. In Comment 1 of our letter we detailed several potential issues regarding the construction design of the proposed groundwater monitoring/soil vapor extraction (SVE) well to be located in the identified source area at the subject site (Site). After reviewing the Letter and other file documents, Regional Board staff has the following comments:

1. According to the Letter, the existing 2-inch SVE well, which is screened from 10 to 45 feet below ground surface (bgs), will be used to target impacted soil from approximately 45 feet bgs and above. The proposed 4-inch SVE well will be modified to have a screen interval from approximately 45 to 120 feet bgs to target deeper impacted soil and gauge and sample groundwater located at a depth of approximately 100 feet bgs at the Site. Your proposal to utilize the 2-inch and 4-inch vapor wells to target contamination in the upper and lower soils adequately addresses the comments and requirements specified in the Regional Board's letter dated January 14, 2011, Comment 1a. Therefore, you are approved to modify the construction parameters for the proposed 4-inch vapor well in accordance with the Letter.

If future sampling data indicate that the referenced SVE wells are not able to target contaminants adequately within the different stratigraphic zones encountered beneath the Site, you may be required to install additional nested SVE wells.

2. In response to Comment 1b of our letter, you indicate that your consultant, Fero Environmental Engineering, Inc. (Fero), intends to use multi-depth vapor probes to evaluate the effectiveness of SVE at the Site. According to file documents, a vapor probe cluster was installed in the vicinity of the source area in 2004. However, these vapor probes only extend to a maximum depth of 60 feet bgs. The *Modified Soils Investigation Work Plan* dated December 30, 2010, prepared by Fero and

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conditionally approved in the Regional Board's letter dated January 14, 2011, does not propose additional deep vapor monitoring probes in the identified source area. Therefore, you are required to install deep vapor monitoring probes in the identified source area (above the saturated zone) at a minimum of 15 foot intervals below 60 feet bgs (i.e. 75 and 90 feet bgs) or where variations in stratigraphy are encountered during drilling, such as the silt layer encountered during the installation of groundwater monitoring well MW-3 at 75 feet bgs. These data will be used to supplement the sampling data from the existing vapor probes installed in the source area.

3. In response to Comment 1c in our letter, you indicate that Fero will turn off the SVE system for a period of at least one week prior to groundwater gauging and sampling at the Site. This action adequately addresses Comment 1c of our letter and will allow representative groundwater elevation data to be collected from the proposed groundwater monitoring/SVE well.

The approval of the above modifications is an amendment to the existing California Water Code (CWC) section 13267 Order issued by this Regional Board on May 5, 2010, and amended in our letter dated January 14, 2011. Pursuant to section 13268 of the CWC, failure to submit all required technical reports associated with the referenced 13267 Order and any existing or future amendments by the specified due dates may result in civil liability administratively imposed by the Regional Board in an amount up to one thousand dollars (\$1,000) for every day each report is not received.

If you have any questions, please contact the project manager Mr. David Young at (213) 576-6733 (dyoung@waterboards.ca.gov).

Sincerely,

for 
Samuel Unger, PE
Executive Officer

cc: Mr. Michael A. Francis, Demetriou, Del Guercio, Springer & Francis, LLP
Mr. Bob Schneider, Trilogy Regulatory Services
Mr. Rick Fero, Fero Environmental Engineering, Incorporated